

From: [Hebert, John](#)
To: [Benbow, Gene](#)
Subject: FW: Bait stations in crops
Date: Sunday, May 05, 2013 10:07:25 PM

fyi....this is the email where he asks me to resend that file. thanks again.

From: Kratville, David@CDFA [david.kratville@cdfa.ca.gov]
Sent: Friday, May 03, 2013 12:49 PM
To: Hebert, John
Subject: RE: Bait stations in crops

John,

When you get a chance could you resend the attached letter as something other than a .tif? I only received the first page of this scan. Unless that is all you intended to send me.

Thanks,

David Kratville
Staff Environmental Scientist
California Dept. of Food & Agriculture

office: (916)654-0768
cell: (916)799-5462

From: Hebert, John [Hebert.John@epa.gov]
Sent: Wednesday, April 17, 2013 11:34 AM
To: Kratville, David@CDFA
Subject: RE: Bait stations in crops

David – This is what I wrote before I actually spoke with someone that has some serious history here:

I just fielded a call from John Inouye on this exact topic. As far as I know there is no such policy. I think we look at these "crop" uses case by case and make a call on whether they are food/nonfood. Things that play into this would be time of application (ie, dormant, bearing, etc), how the product is applied, etc. Use of bait station may make a rodenticide "non-food" but I don't know if we can say that for all situations. Make sense? Helpful?

So, I've attached a memo from 1987 that does have some guidance on how we might make these determinations. I don't think what I said is necessarily wrong though....I think it's still case by case. Can you please share this with John Inouye too? Thanks.....

John

From: Kratville, David@CDFA [mailto:david.kratville@cdfa.ca.gov]
Sent: Wednesday, April 17, 2013 12:13 PM
To: Hebert, John
Subject: Bait stations in crops

John,

I was recently asked if there was a guidance letter that discusses bait stations application of rodenticides within crops. The gentleman I spoke to claimed he had read that it was reasonable to assume that crop contamination would not occur if using bait stations. Would he be referring to a document that EPA produced or perhaps DPR?

Thank you,

David Kratville
Environmental Scientist
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